

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE THE APPLICATION OF
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS TO UNSEAL
CRIMINAL PROSECUTION OF JULIAN
ASSANGE

Misc. Action No. 18-mc-37
Related to Case No. 18-cr-111

DECLARATION OF KATIE TOWNSEND IN SUPPORT OF
THE RENEWED APPLICATION OF THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS TO UNSEAL CRIMINAL PROSECUTION OF
JULIAN ASSANGE

I, Katie Townsend, declare as follows:

1. I am the Legal Director at the Reporters Committee for Freedom of the Press (the “Reporters Committee” or “RCFP”), an unincorporated nonprofit association located in Washington, D.C., a position I have held since May 2018. Prior to becoming RCFP’s Legal Director, I was its Litigation Director; I held that position from September 2014 to May 2018.

2. I am an attorney and counsel for the Reporters Committee in this matter. I am a member in good standing of the bar of the states of New York, California, and of the District of Columbia. I have been admitted *pro hac vice* in this matter. I make this declaration in support of the Reporters Committee’s Renewed Application to Unseal Criminal Prosecution of Julian Assange. I have personal knowledge of the matters stated in this declaration.

3. Attached hereto as **Exhibit A** is a true and correct copy of the government’s indictment of Julian Assange dated March 6, 2018 charging Assange with one count of

conspiring to commit computer intrusions in violation of 18 U.S.C. §§ 371, 1030(a)(1), 1030(a)(2) and 1030(c)(2)(B)(ii).

4. Attached hereto as **Exhibit B** is a true and correct copy of the publicly available electronic docket in *United States v. Assange*, Case No. 18-cr-111, which I obtained from PACER. Exhibit B reflects the publicly available electronic docket in that matter as of the filing of the Reporter Committee's Renewed Application.

5. Attached hereto as **Exhibit C** is a true and correct copy of the government's redacted version of its December 21, 2017 motion to seal, ECF No. 5, which was docketed in redacted form on April 17, 2019 as ECF No. 24. I obtained this copy from PACER.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of April 2019 in Washington, D.C.



Katie Townsend